

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UL LLC,

Plaintiff,

v.

JOSHUA CALLINGTON,

Defendant.

Case No. 1:24-cv-05631

Hon. Andrea R. Wood

PLAINTIFF UL LLC’S MOTION FOR A LIMITED PRELIMINARY INJUNCTION

Pursuant to the Court’s May 5, 2025, Order (ECF No. 55), and Rule 65(a) of the Federal Rules of Civil Procedure, Plaintiff UL LLC, (“UL” or “Plaintiff”), by and through counsel, requests a preliminary injunction against Defendant Joshua Callington (“Callington”) to:

- 1) Require Callington, within not later than 14 days after the Court’s entry of an injunctive order, to produce to UL copies of any and all UL documents and ESI—and any other UL property, tangible or intangible—that is in his possession or under his control and that he acquired or took from UL through his employment or working-relationship with UL. This will reasonably allow UL to designate the documents and ESI as “confidential”—where needed and appropriate—under the Interim Document Preservation Non-Disclosure Order in place and/or under a final protective order that is put in place for this case; and
- 2) Restrain Callington from using, modifying, deleting, publishing, disseminating, or otherwise disclosing to any person or entity (except as required or allowed by law)—whether in hard copy or electronic form—any of UL’s or its customers’ or employees’ confidential, proprietary, and trade secret information, business documents, ESI, personal identifying information, and any other property, tangible or intangible, that is in Callington’s possession or under his control and which he acquired or took from UL through his employment or working-relationship with UL.

As discussed in UL’s Memorandum of Law in Support of its Motion for A Limited Preliminary Injunction, supporting declarations, and exhibits, UL is likely to succeed on the merits of all claims

asserted against Callington and injunctive relief is warranted to prevent further irreparable harm to UL.

WHEREFORE, for the foregoing reasons, and those set forth in UL's Memorandum of Law in Support of its Motion for A Limited Preliminary Injunction, supporting declarations and exhibits, UL respectfully requests that this Court enter an Order granting preliminary injunctive relief to UL.

Respectfully submitted,

UL LLC

By: /s/ James M. Witz

One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 20th day of May, 2025, filed a copy of the foregoing document, *Plaintiff UL LLC's Motion for A Limited Preliminary Injunction*, electronically. Counsel of record for Defendant may access this filing through the Court's system.

/s/ James M. Witz

An Attorney for Plaintiff

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